Case 2:22-cv-01840-KJM-KJN Document 1-5 Filed 10/14/22 Page 1 of 2 1 Adam Y. Siegel (SBN 238568) JACKSON LEWIS P.C. 2 725 South Figueroa Street, Suite 2500 Los Angeles, California 90017-5408 3 Telephone: (213) 689-0404 Facsimile: (213) 689-0430 4 E-mail: Adam.Siegel@jacksonlewis.com 5 Mossamat N. Karim (State Bar No. 329711) JACKSON LEWIS P.C. 6 50 California Street, 9th Floor San Francisco, CA 94111-4615 7 Telephone: (415) 796-5421 (415) 394-9401 Facsimile: 8 E-mail: Mossamat.Karim@jacksonlewis.com 9 Attorneys for Defendants CLAIRE'S BOUTIQUES, INC. 10 AND CLAIRE'S HOLDINGS, LLC UNITED STATES DISTRICT COURT 11 EASTERN DISTRICT OF CALIFORNIA 12 13 KILA SMITH, Case No. 14 Plaintiff, DECLARATION OF DANIELLE CLARK 15 IN SUPPORT OF DEFENDANTS' NOTICE OF REMOVAL 16 CLAIRE'S BOUTIQUES, INC. a Michigan (Filed concurrently with Notice of Removal; 17 Declarations of Michele Reilly and Adam Y. Corporation; CLAIRE'S HOLDINGS, LLC, a Siegel; Civil Case Cover Sheet; Notice of Limited Liability Company; RYAN VERO, an 18 individual; and DOES 1 through 100, Interested Parties; and Corporate Disclosure inclusive, Statement) 19 Defendants. Complaint Filed: 08/05/2022 20 Trial Date: TBD 21 I, DANIELLE CLARK, declare as follows: 22 1. I am over the age of 18 and competent to testify. The following facts are based on 23 my personal knowledge or based on my personal review of records kept in the course of regularly 24 25 conducted business activities by Defendant Claire's Boutiques, Inc. and Defendant Claire's Holdings, LLC (hereinafter also referred to as "Defendants"). If called as a witness, I can and will 26 competently testify hereto. 27 28 2. I submit this declaration in support of Defendants' Notice of Removal. DECLARATION OF DANIELLE CLARK

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1	 I am currently the Director, Human Resources Business Partner Field Functions for
2	Defendants and have been employed by Defendants in various human resources roles since 2000.
3	As a result, I am very familiar with Defendants' corporate structures and their executive,
4	administrative, financial and management functions.
5	4. In the course and scope of my employment as Director, Human Resources Business
6	Partner Field Functions, I have access to and regularly review Defendants' payroll data and
7	personnel records for current and former employees. Furthermore, I have access to and regularly
8	review payroll data and records that are created, maintained, regularly updated, and kept by
9	Defendants in the regular and ordinary course of business. Based on my role asDirector, Human
10	Resources Business Partner Field Functions, I have access to the payroll and personnel records of
11	Plaintiff Kila Smith ("Plaintiff"). Based on my review of Plaintiff's payroll records, which were
12	created, maintained, and kept by Defendant in the regular and ordinary course of business, I
13	understand that throughout Plaintiff's employment for Defendant, she worked anywhere from 15-37
14	hours per week and earned \$19.85 per hour. Based on my review of Plaintiff's personnel records,
15	which were also created, maintained, and kept by Defendant in the regular and ordinary course of
16	business, I understand that Plaintiff's residential address was located in Citrus Heights, California
17	throughout the course of her employment with Defendant.
18	I declare under oath and penalty of perjury under the laws of the State of California and
19	the United States of America that the foregoing is true and correct.
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22	Details October 12, 2022
23	Dated: October 13, 2022
24	Danielle Clark
25	DANIELLE CLARK
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